



75 West Center • Provo, Utah 84601-4483
tel 801-345-9800 • fax 801-345-9899
www.pharmanex.com

By Federal Express

November 18, 1999

Rec'd
11/23/99

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Notification for Certain Types of Statements on Dietary Supplements

Dear Sir or Madam:

As required by Section 403 (r)(6)(c) of the Food, Drug and Cosmetic Act, Pharmanex, Inc., 2000 Sierra Point Parkway, Brisbane, California 94005, intends to market a dietary supplement product with the following label statements of nutritional support:

Product identified as **Vein Formula** with the following label statements:

- *Promotes beauty from the inside out.*
- *Promotes leg vein health.*
- *Provides the beneficial ingredients that help promote better circulatory and leg vein health.*
- *A patented grape seed extract (Masquelier Original OPC 85) and vitamin C work together to promote healthy collagen, which provide structural integrity to the vascular system.*
- *Helps maintain normal water balance in the legs.*
- *Helps nutritionally reinforce the circulatory health of your legs.*
- *Provides clinically tested nutrients that help maintain circulation and leg vein health, keeping legs looking attractive and healthy.*
- *Helps maintain normal water balance by promoting capillary integrity in the legs.*

I certify that the information contained in this notice is complete and accurate and that Pharmanex, Inc. has substantiation that these statements are truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Smidt'.

Carsten Smidt
Director of Nutrition Research

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